

California Integrated Waste Management Board

LOCAL ASSISTANCE AND PLANNING COMMITTEE

July 16, 1997

AGENDA ITEM 3

**ITEM:** Consideration of Staff Recommendation on the Adequacy of the Source Reduction and Recycling Element for the City of Union City, Alameda County

**STAFF COMMENTS:**

The City of Union City SRRE projects diversion for 1995 as 25.8 percent and 51.6 percent for the year 2000. Adjusting for the exclusion of sewage sludge from the base-year disposal amount and restricted wastes these percentages change to 14.2 percent for 1995 and 30.2 percent for the year 2000, significantly below the mandated goal of 25 percent and 50 percent. Staff notified the City in a letter dated April 23, 1997 of the restricted waste issues.

The City of Union City plans to continue its curbside collection of separated materials (single and multifamily residences). In addition, the City is planning to implement several source reduction, recycling, composting and special waste diversion programs to meet the mandated goals. Such programs include: backyard composting; recycled and reusable procurement guidelines; commercial white paper and glass container collection programs; and curbside collection of yard waste.

Education efforts focus on educating citizens through residential promotional campaigns, community newsletters, media promotions, and promotion at community events.

Staff recommend disapproval for the City of Union City Source Reduction and Recycling Element based on the exclusion of 63,875 tons of sewage sludge from the base-year disposal amount and restricted waste types in the base-year that result in both diversion projections that fall below the 25 percent and 50 percent mandated goals.

**ANALYSIS:**

**SRRE**

SRRE ADEQUACY	YES	NO
All required documentation submitted	X	
CIWMB draft comments adequately addressed	X	
LTF comments addressed	X	
Meets SRRE criteria (in CIWMP Adequacy Report)	X	
Meets SWGS criteria (in CIWMP Adequacy Report)		X
1995 corrected diversion projection is 25% or more		14.2
2000 corrected diversion projection is 50% or more		30.2

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**Explanation of any "No" responses:**

The SWGS, as submitted, does not meet the following criteria. Changes in tonnage are listed in the table below.

**Restricted Materials.** The City claimed base-year diversion for 1,738 tons of restricted waste materials including, 1,331 tons of inert solids, 194 tons of ferrous metals and tin cans, and 213 tons of non-ferrous metals. No documentation was received to claim diversion waste credit for these materials, so 1,738 tons were deducted from the base-year, 1995, and 2000 diversion amounts.

**Special Waste.** The City did not include 63,875 tons of landfilled sewage sludge in the base-year disposal amount. Since the sewage sludge was disposed in a Board-permitted solid waste facility, 63,875 tons were added to the base-year, 1995, and 2000 disposal amounts.

The SWGS as corrected meets the SWGS criteria.

**Area of Concern**

In Table 6-2 of the SRRE, the City proposed incineration of tires as a diversion program for the year 2000. Statute requires that jurisdictions meet the appropriate conditions in PRC Sections 40106, 41781.2 (g), and 41783.1 to claim up to 10 of the 50% diversion goal for biomass conversion, or PRC Sections 40201 and 41783 for transformation in the year 2000. Because tires are not included in the definition of biomass, they do not qualify for diversion credit as biomass conversion in the year 2000. Likewise, transformation of tires at a facility not permitted by the Board does not qualify as diversion tonnage which may be counted toward the 50% diversion goal.

City of Union City	Base-Year			1995			2000		
	Dis.	Div.	Gen.	Dis.	Div.	Gen.	Dis.	Div.	Gen.
Original Claim	72,613	13,392	86,005	67,432	23,449	90,881	46,527	49,574	96,101
Changes to claimed tons:									
Restricted materials:									
Inert solids	0	(-1,331)	(-1,331)	0	(-1,331)	(-1,331)	0	(-1,331)	(-1,331)
Scrap metals	0	(-407)	(-407)	0	(-407)	(-407)	0	(-407)	(-407)
Agricultural waste	0	0	0	0	0	0	0	0	0
White goods	0	0	0	0	0	0	0	0	0
Subtotal	0	(-1,738)	(-1,738)	0	(-1,738)	(-1,738)	0	(-1,738)	(-1,738)
Sludge	63,875	0	63,875	63,875	0	63,875	63,875	0	63,875
Corrected Totals	136,488	11,654	148,142	131,307	21,711	153,018	110,402	47,836	158,238
Claimed diversion rates		15.6%			25.8%			51.6%	
Corrected diversion rates		7.9%			14.2%			30.2%	

ATTACHMENTS:

- 1: Resolution # 97-273 Disapproval of the SRRE for the City of Union City,  
Alameda County.

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Legal Review: EB Date/time: 6/22/97